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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CHENYANG WANG, *et al.*,
Plaintiffs,

v.

UR JADDOU, Director, United States
Citizenship and Immigration Services,
Defendant.

C 4:22-cv-00386 KAW

**STIPULATION TO DISMISS and
ORDER**

Pursuant to Federal Rules of Civil Procedure 41(a)(1)(ii), the parties, through their undersigned attorneys, agree to stipulate to dismiss this action based on the following terms:

1. Defendant United States Citizenship and Immigration Services (“USCIS”) agrees to take adjudicative action—an approval or denial—on the three remaining Plaintiffs’ Form I-765, Application for Employment Authorization and Form I-131, Application for Travel Document, on or by March 31, 2022.
2. USCIS will adjudicate Plaintiff Kento Onishi’s Form I-765 on or by March 24, 2022.
3. Plaintiffs agree that all Plaintiffs’ Form I-765 and Form I-131 that have already been adjudicated during the course of this action are moot.

1 4. If Plaintiffs believe there is a breach of this agreement, Plaintiffs agree to give
2 Defendant's counsel notice and seven days to remedy such breach prior to seeking judicial intervention.

3 5. If Defendant is unable to meet these deadlines for reasons out of its control, it agrees to
4 notify counsel for Plaintiffs and the parties agree to work in good faith to resolve the issue prior to
5 judicial intervention.

6 6. The parties agree to bear their own costs and fees. In accordance with Civil Local Rule
7 5(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this
8 document.

9 Dated: March 10, 2022

Respectfully submitted,

10 STEPHANIE M. HINDS
11 United States Attorney

12 /s/ Elizabeth D. Kurlan
13 ELIZABETH D. KURLAN
14 Assistant United States Attorney
15 Attorneys for Defendant

16 Dated: March 9, 2022

17 /s/ Bernard Pavel Wolfsdorf/
18 BERNARD PAVEL WOLFSDORF
19 Attorney for Plaintiffs

20 **ORDER**

21 Pursuant to stipulation, IT IS SO ORDERED.

22 Date: March 11, 2022

23 
24 KANDIS A. WESTMORE
25 United States Magistrate Judge
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